SHAD 15/07

STATE OF CALIFORNIA STATE AND CONSUMER SERVICES AGENCY CALIFORNIA BUILDING STANDARDS COMMISSION 2525 NATOMAS PARK DR., SUITE 130 SACRAMENTO, CA 95833 (916) 263-0916 Phone (916) 263-0959 Fax Email: BSC@dgs.ca.gov

	TO SEE THE NOTICE DATED MARCH 18, 2008 Written comments are to be sent to the above address.								
	82	WRITTEN COMMENT DEADLINE: MAY 12, 2008							
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Agency, jurisdiction, chapter, company, association, individual, etc.									
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Street	•				City		State	Zip	
I/We ☐ (do) ☒ (do not) agree with:									
The Agency proposed modifications As Submitted on Section No. 315.1.1 2007 CMC OSHPD 1 & 4									
and request that this section or reference provision be recommended:									
□ A	pprov	/ed [Disa	oproved	☐ Held for F	urther Study		ed as Amer	nded
to the proposing state agency.									

Suggested Revisions to the Text of the Regulations:

Exception: Calculations substantiating that the humidity will not be outside the range shown in Table 315 more than 5.0% of the time on an annual basis may be submitted to OSHPD as an alternate method of compliance. Humidifiers are not required if OSHPD approves the alternate method of compliance. Calculations shall be performed by a California licensed mechanical engineer and shall be based on the 1982 ASHRAE Climatic Data for Region X or other nationally recognized weather data.

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The public interest requires the adoption of the building standards.

The code requires relative humidity levels be maintained above 30% rH in hospital operating rooms and special procedure rooms by installing humidifiers in hospitals throughout California. The majority of California hospitals turn off the humidifiers as soon as they are approved by OSHPD. Low humidity is a comfort issue not a life safety issue, left over from the use of flammable anesthesia gases. Current practices and procedures do not create a combustible gas environment in these rooms. Periodic operation of humidifiers creates a serious infection control risk as they add moisture to ducts creating a mold enriched environment. California hospitals spend literally millions of dollars installing humidifiers that are not used. This proposed changes will allow hospitals in the state to avoid the cost of humidification.

Thean King